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GENOVA, MALIN & TRIER LLP

Attorneys for Debtor

Hampton Business Center

1136 Route 9

Wappingers Falls, New York 12590

(845) 298-1600

Andrea B. Malin, Esq. (AM4424)

Michelle L. Trier, Esq. (MT1212)

Presentment Date and Time:

DATE: FEBRUARY 28, 2022

TIME: 12:00 P.M.

UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF NEW YORK

POUGHKEEPSIE DIVISION

-----X

IN RE:

MARIANNE B. WALDRON,

CHAPTER 11

CASE NO. 22-35056 (CGM)

Debtor.

-----X

**NOTICE OF PRESENTMENT OF APPLICATION FOR ORDER
APPROVING EMPLOYMENT OF ATTORNEYS FOR THE DEBTOR**

PLEASE TAKE NOTICE that the undersigned will present the attached proposed Order Approving Employment of Attorneys, GENOVA, MALIN & TRIER LLP, as attorneys for the debtor, to the Honorable Cecelia G. Morris, Chief United States Bankruptcy Judge, for signature on February 28, 2022 at 12:00 p.m.;

PLEASE TAKE FURTHER NOTICE that objections, if any, to the proposed Order must be made in writing and received in the Bankruptcy Judge's chambers and by the undersigned not later than 11:00 a.m. on February 28, 2022. Unless objections are received by that time, the order may be signed.

Dated: Wappingers Falls, New York
February 4, 2022

GENOVA, MALIN & TRIER LLP
Attorneys for Debtor

By: /s/ Michelle L. Trier
MICHELLE L. TRIER
Hampton Business Center
1136 Route 9
Wappingers Falls, NY 12590

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
POUGHKEEPSIE DIVISION

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IN RE:

MARIANNE B. WALDRON,

Debtor.

CHAPTER 11
CASE NO. 22-35056 (CGM)

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APPLICATION FOR ORDER AUTHORIZING EMPLOYMENT OF ATTORNEY

TO: THE HONORABLE CECILIA G. MORRIS, CHIEF U.S. BANKRUPTCY JUDGE:

The application of the above-named debtor, MARIANNE B. WALDRON (the “Debtor” or “Applicant”) respectfully represents:

1. On February 7, 2022, your Applicant filed a petition under Chapter 11 of the United States Bankruptcy Code.
2. An Order for Relief was entered upon the filing of the Applicant’s Chapter 11 Petition.
3. The Applicant wishes to employ the law firm of GENOVA, MALIN & TRIER, LLP, as attorneys duly admitted to practice in this Court to represent her in this case.
4. Your Applicant has selected GENOVA, MALIN & TRIER, LLP for the reason that the firm has had considerable experience in the matters of this character, and is well qualified to represent her.

5. The professional services GENOVA, MALIN & TRIER, LLP will render are:

- a. to give your Applicant legal advice with respect to her powers and duties in her financial situation and management of the property of the Debtor;
- b. to take necessary action to void liens against your Applicant's property;
- c. to prepare and/or amend, on behalf of your Applicant, necessary petitions, schedules, orders, pleadings and other legal papers; and
- d. to perform all other legal services for your Applicant as Debtor which may be necessary herein.

6. To the best of your Applicant's knowledge, GENOVA, MALIN & TRIER, LLP does not hold or represent any interest adverse to the Bankruptcy Estate and is a disinterested person, does not and will not, while employed by the Debtor, represent in connection with this case the creditors, or any other party in interest, or its respective attorneys and accountants. This firm has no relationship with the office of the U.S. Trustee except that THOMAS GENOVA, retired from the firm, was a member of Chapter 7 Trustee panel for the Southern District of New York. The firm is a disinterested person within the meaning of 11 U.S.C. Section 101(14).

7. Your Applicant desires to employ GENOVA, MALIN & TRIER, LLP under a general retainer.

8. Upon information and belief, a committee of creditors has not been appointed or designated herein.

9. No previous application has been made for the relief sought herein.

WHEREFORE, your applicant respectfully prays that it be authorized to employ GENOVA, MALIN & TRIER, LLP under a general retainer to represent it as Debtor's counsel in this case, and

that she have such other and further relief as to this Court may seem just and proper.

Dated: Wappingers Falls, New York
February 7, 2022

/s/ Marianne B. Waldron
MARIANNE B. WALDRON

GENOVA, MALIN & TRIER, LLP
Attorneys for the Debtor
1136 Route 9
Wappingers Falls, NY 12590
(845) 298-1600
Andrea B. Malin, Esq. (AM4424)
Michelle L. Trier, Esq. (MT1212)

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
POUGHKEEPSIE DIVISION

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IN RE:

MARIANNE B. WALDRON,

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AFFIDAVIT OF PROPOSED ATTORNEY

STATE OF NEW YORK)
)ss.:
COUNTY OF DUTCHESS)

I, MICHELLE L. TRIER, being duly sworn deposes and says:

1. I am an attorney at law, a partner in the law firm of GENOVA, MALIN & TRIER, LLP, and duly admitted to practice in the State of New York and in this Court.
2. That GENOVA, MALIN & TRIER, LLP maintains an office for the practice of law at 1136 Route 9, Wappingers Falls, New York, 12590.
3. The professional services GENOVA, MALIN & TRIER, LLP will render are:
 - a. to give your Applicant legal advice with respect to its powers and duties in the continued financial situation and management of the property of the Debtor;
 - b. to take necessary action to void liens against your Applicant's property;
 - c. to prepare and/or amend, on behalf of your Applicant, necessary petitions,

schedules, orders, pleadings and other legal papers; and

- d. to perform all other legal services for your Applicant as debtor which may be necessary herein.

4. Your applicant desires to employ GENOVA, MALIN & TRIER, LLP under a general retainer.

5. That the firm does not hold or represent any interest adverse to the Bankruptcy Estate, and it is a disinterested person, does not and will not, while employed by the Debtor, represent in connection with this case the creditors, or any other party in interest, or its respective attorneys and accountants. This firm has no relationship with the office of the U.S. Trustee or any person employed in the office of the United States trustee, except that THOMAS GENOVA, retired from the firm, was a member of Chapter 7 Trustee panel for the Southern District of New York. This firm had no connection with the debtor, creditors, any other party in interest and/or their respective attorneys and accountants.

6. That, the firm is a disinterested person within the meaning of 11 U.S.C. § 101(14) as the firm (A) is not a creditor, a equity security holder, or an insider; (B) is not and was not, within 2 years before the date of the filing of the petition, a director, officer or employee of the debtor; and (C) does not have an interest materially adverse to the interest of the estate or of any class of

creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the debtors, or for any other reason.

Dated: Wappingers Falls, New York
February 7, 2022

/s/ Michelle L. Trier
MICHELLE L. TRIER, ESQ.

Sworn to before me this 7TH day
of February, 2022

/s/ Andrea B. Malin
Andrea B. Malin
Notary Public, State of New York
Qualified in Dutchess County
Commission Expires 6/23/2022

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
POUGHKEEPSIE DIVISION

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IN RE:

MARIANNE B. WALDRON,

CHAPTER 11
CASE NO. 22-35056 (CGM)

Debtor.

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ORDER AUTHORIZING EMPLOYMENT OF ATTORNEY

UPON the annexed Application of the above-named debtor, seeking authority to employ the law firm, GENOVA, MALIN & TRIER, LLP, under a general retainer to represent it as debtor, and it appearing that the law firm of GENOVA, MALIN & TRIER, LLP is duly authorized to practice in this Court, and the Court being satisfied that said law firm does not hold or represent any interest adverse to the Bankruptcy Estate and is a disinterested person within the meaning of 11 U.S.C. Section 101(14), it is

ORDERED, that pursuant to 11 U.S.C. Section 327(a), MARIANNE B. WALDRON, be and she hereby is authorized to employ the law firm of GENOVA, MALIN & TRIER, LLP to represent her under a general retainer in this case, compensation to be fixed by the Court upon proper application therefore.

No Objection:

WILLIAM K. HARRINGTON
UNITED STATES TRUSTEE

By: _____
Alicia M. Leonhard, Esq.
Trial Attorney

Dated: February ___, 2022